Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Georgia-Pacific Wood Products LLC
Facility Name:	Georgia-Pacific Wood Products LLC – Emporia Plywood
Facility Location:	634 Davis Street Emporia, Virginia 23847
Registration Number:	50283
Permit Number:	PRO50283

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Sections I through IX)

July 22, 2008
Effective Date

July 22, 2013
Expiration Date

_____
Kyle I. Winter, P.E.
Deputy Regional Director

_____
Signature Date

Table of Contents

I. Facility Information

Permittee/Facility
Georgia-Pacific Wood Products LLC – Emporia Plywood
634 Davis Street
Emporia, Virginia 23847

Responsible Official
Joey N. Pate
Plant Manager

Contact Person
Robby Bullock
Environmental Coordinator
(434) 634-5123

County-Plant Identification Number: 51-081-0020

Facility Description: NAICS 321212 – Softwood Plywood Manufacturing
SIC 2436 – Softwood Plywood Manufacturing

Logs are received in the Log Yard and taken to the Cut-Up where they go through debarking and are cut to usable lengths before being soaked in vats of hot water to loosen the fibers for peeling. Veneer is cut from the logs in the "Green End", and any residuals are chipped for use in the steam boiler or for shipment off-site.

After the veneer is sorted and clipped, it is dried in one of three veneer dryers, glued, and pressed. The plywood boards are then cooled and transported to the Plywood Trim Panel Saw to trim the edges. Sawdust generated from this process is collected in a vacuum system located above each saw, and transported to the Central Dry Waste System.

The facility is a Title V major source. This source is located in an attainment area for all pollutants, and is also a PSD major source, due to permitted emissions from its wood-fired boiler and dryers.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
WWB	BS	Erie City VC Woodwaste Boiler	179.4 MMBtu/hr	- Western Precipitation (Model 12VM, Size 50-5), multicyclone - Bumstead-Woolford (12-foot diameter) scrubber	B1 B2	PM, PM_{10}	11/28/1977
Cut Up and Green End							
DB1 DB2	EP13a EP13b	Log Debarkers 1 and 2	2,877 tons/hr	--	--	--	--
CS	EP1 EP2	Chip Transfer System	50 tons/hr	Burning and Federal cyclone	C1 C2	PM, PM_{10}	--
Veneer Dryers							
VD1	TCO-1	Coe Dryer, Steam-Heated Veneer Dryer, No. 1	11,200 ft^2/hr 3/8" Basis	Pro-Environmental 2 canister RCO/RTO	RCO/RTO-1	PM, PM_{10}, VOC, Volatile HAPs	9/8/2006
VD2	TCO-1	Coe Dryer, Steam-Heated Veneer Dryer, No. 2	20,400 ft^2/hr 3/8" Basis	- Pro-Environmental 2 canister RCO/RTO - Derand cyclone	RCO/RTO-1 C4	PM, PM_{10}, VOC, Volatile HAPs	9/8/2006
VD3	TCO-1	Coe Dryer, Steam-Heated Veneer Dryer, No. 3	20,400 ft^2/hr 3/8" Basis	- Pro-Environmental 2 canister RCO/RTO - Derand cyclone	RCO/RTO-1 C4	PM, PM_{10}, VOC, Volatile HAPs	9/8/2006
Veneer Conditioning Chamber							
VCC	EP16	Veneer Conditioning Chamber	2,652 ft^2/hr 3/8" Basis	--	--	--	9/8/2006

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Plywood Presses							
P1 P2 P3	EP9	Williams-White Plywood Presses	62,030 ft^2/hr 3/8" Basis each	--	--	--	9/8/2006
Specialty Lines							
CTL	EP6	Dry Waste Transfer System	1.5 tons/hr	- Peerless Division cyclone - Carter Day baghouse	C6 BH2	PM, PM_{10}	--
SDR	EP7	Sander (Finishing)	58,237 ft^2/hr	- Cyclone - Carter Day baghouse	C5 BH1	PM, PM_{10}	--
SC-1	Fugitive	Moisture Sealant Surface Coating Line	58,000 ft^2/hr	--	--	--	9/8/2006
Storage of Wood Residuals							
CTLB	Fugitive	Central Truck Loading Bin	1.5 tons/hr	--	--	--	--

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – (Emission Unit ID# WWB)

A. Limitations

1. Particulate emissions from the wood-fired boiler (EU ID# WWB) shall be controlled by the use of a multicyclone collector followed by a scrubber. The multicyclone collector and scrubber shall be provided with adequate access for inspection.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, and the 11/28/77 Permit)

2. The approved fuel for the wood-fired boiler is wood waste. "Wood waste" is defined as wood feed stock, bark, resinated and unresinated sawdust, sanderdust, dry waste, board trimmings, and other wood wastes capable of being hogged. This definition does not include wood contaminated with paints, plastics, finishing material, other foreign materials which might emit toxic air pollutants when burned, or other chemical treatments, except the wood waste may contain small quantities of equipment washdown oil, oil-contaminated spill cleanup material, process resins, glue solids, waxes, and edge sealers generated at the facility. The woodwaste may also contain small quantities of fuel oil for use during boiler startup. A change in fuel may require a permit to modify and operate.

   (9 VAC 5-80-110 and Condition 5 of 11/28/77 Permit)

3. The wood-fired boiler shall consume no more than 173,800 tons of wood waste per year, calculated as the sum of each consecutive twelve (12) month period.

   (9 VAC 5-80-110)

4. Emissions from the operation of the wood-fired boiler shall not exceed the limits specified below:

Particulate Matter	27.0	lbs/hr	117.3	tons/yr

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 2 of 11/28/77 Permit)

5. Visible emissions (excluding condensed water vapor/steam) from the wood-fired boiler stack shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

   (9 VAC 5-50-80 and 9 VAC 5-80-110)

6. Boiler emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum.

   (9 VAC 5-80-110)

B. Monitoring

1. An annual internal inspection shall be conducted on the multicyclone by the permittee to insure structural integrity.

   (9 VAC 5-80-110)

2. The permittee shall install differential pressure monitoring equipment on the multicyclone and measure and record a baseline differential during the stack test required by Condition III.D.2, while the boiler is demonstrating compliance with the limit contained in Condition III.A.4. The differential pressure shall be monitored and recorded on a weekly basis. If the differential pressure deviates more than 20% below baseline differential pressure, the permittee shall perform an inspection of the multicyclone to determine the cause of the abnormal condition, and take steps to correct it.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

3. The scrubber (PCD ID# B2) shall be equipped with a flow meter. The permittee shall measure and record a baseline flow during the stack test required by Condition III.D.2., while the boiler is demonstrating compliance with the limit contained in Condition III.A.4. If the flow deviates more than 20% below the baseline flow rate, the permittee shall perform an inspection of the scrubber to determine the cause of the abnormal condition, and take steps to correct it.

   (9 VAC 5-80-110)

4. The wood-fired boiler stack shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-80-110 and 9 VAC 5-50-20)

5. The permittee shall use appropriate emission factors and throughput data to verify, on a monthly basis, that the hourly and annual (12-month) emission limits for particulate matter are not exceeded.

   (9 VAC 5-80-110)

6. **Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the scrubber controlling the wood-fired boiler according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
• Continuously monitor and record the make-up water flow rate. • Records shall be collected by a Data Acquisition System (DAS) or strip chart.	• Scrubber flow meter shall be calibrated at least annually based on manufacturer specifications.	• Tested indicator for the make-up water flow rate: The baseline flow established during the stack test required by Condition III.D.2. • Excursion: If the flow deviates more than 20% below the baseline flow rate for the 3-hour block period. • Data points shall be collected every 15 minutes, averaged over a 3-hour block period.

7. **Compliance Assurance Monitoring (CAM) -** The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

   (9 VAC 5-80-110 E and 40 CFR 64.6 (c))

8. **Compliance Assurance Monitoring (CAM) -** At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

   (9 VAC 5-80-110 E and 40 CFR 64.7 (b))

9. **Compliance Assurance Monitoring (CAM) -** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the wood-fired boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

   (9 VAC 5-80-110 E and 40 CFR 64.7 (c))

10. **Compliance Assurance Monitoring (CAM) -** Upon detecting an excursion or exceedance, the permittee shall restore operation of the wood-fired boiler (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

    (9 VAC 5-80-110 E and 40 CFR 64.7 (d)(1))

11. **Compliance Assurance Monitoring (CAM) -** Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

    (9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))

12. **Compliance Assurance Monitoring (CAM) -** If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to,

reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(9 VAC 5-80-110 E and 40 CFR 64.7(e))

13. **Compliance Assurance Monitoring (CAM) -** If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the wood-fired boiler for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

    a. Improved preventative maintenance practices;

    b. Process operation changes;

    c. Appropriate improvements to control methods;

    d. Other steps appropriate to correct control performance; and

    e. More frequent or improved monitoring.

    (9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

    a. Tons of wood waste combusted in the wood-fired boiler on a monthly and annual basis. Tons per year consumption is calculated as the sum of each consecutive 12-month period.

    b. Calculation of hourly and annual emissions of particulate matter (PM). Annual emissions shall be calculated as the sum of each consecutive 12-month period.

    c. Differential pressure readings across the wood-fired boiler multicyclone and results of multicyclone inspections.

    d. Flow readings across the scrubber and scrubber maintenance records.

    e. Results of visible emissions observations, any subsequent Method 9 visible emission evaluations, the cause of any abnormal and excess visible emissions, corrective measures taken to correct the excess visible emissions, and records of conditions which prevent Method 9 visible emission evaluations in the event of an apparently abnormal visible emission condition.

    f. Results of any emissions testing.

    These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.

(9 VAC 5-50-50 and 9 VAC 5-80-110)

2. The permittee shall maintain records of the required training including a statement of time, place and nature training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the boilers. These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.
   (9 VAC 5-80-110)

3. **Compliance Assurance Monitoring (CAM) Recordkeeping -** The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
   (9 VAC 5-80-110 E and 40 CFR 64.9(b))

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
   (9 VAC 5-50-30 and 9 VAC 5-80-110)

2. The permittee shall perform a Method 5 stack test on the Erie City boiler (WWB) stack within 180 days of the issuance of this permit.
   (9 VAC 5-80-110 K)

3. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
   (9 VAC 5-80-110)

E. Reporting

1. The permittee shall report the results of any 40 CFR Part 60, Appendix A Method 9 visible emissions evaluation performed in accordance with Condition III.B.4. If the test indicates that the boiler is out of compliance with the opacity standard, the source shall also report the length of time associated with any exceedance of the standard and the corrective action taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
   (9 VAC 50-50-50 and 9 VAC 5-80-110 E)

2. The results of the stack tests required by Condition III.D.2 shall be submitted to the Director, Piedmont Region within 45 days from the date the tests are conducted.
   (9 VAC 5-80-110)

3. The permittee shall submit reports semi-annually to the Director, Piedmont Regional Office of the following:

   a. Instances when the device used to measure differential pressure across the multicyclone is more than 20% below normal range and any corrective action taken;

b. Instances when the device used to measure flow across the scrubber is more than 20% below normal range and any corrective action taken;

c. Any month during which the calculated annual emissions from the boiler exceed the standard listed in Condition III.A.4.

(9 VAC 5-80-110 B)

4. **Compliance Assurance Monitoring (CAM) Reporting** - The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by General Condition C.3 of this permit to the Director, Piedmont Regional Office. Such reports shall include at a minimum:

a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

IV. Process Equipment Requirements – (Cut-Up and Green End EU ID# DB1, DB2, and CS; Dry Waste Transfer System EU ID# CTL; Specialty Lines Sander EU ID# SDR; Central Truck Loading Bin EU ID# CTLB)

A. Limitations

1. Visible emissions (excluding condensed water vapor/steam) from the Cut-Up and Green End (EU ID# DB1, DB2, and CS) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
   (9 VAC 5-40-80 and 9 VAC 5-80-110)

2. Visible emissions (excluding condensed water vapor/steam) from the Dry Waste Transfer System (EU ID# CTL) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
   (9 VAC 5-40-80 and 9 VAC 5-80-110)

3. Visible emissions (excluding condensed water vapor/steam) from the Sander (EU ID# SDR) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
   (9 VAC 5-40-80 and 9 VAC 5-80-110)

4. Visible emissions (excluding condensed water vapor/steam) from the Central Truck Loading Bin (EU ID# CTLB) shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six minute period in any one hour, in which opacity shall not exceed 60 percent.
   (9 VAC 5-40-80 and 9 VAC 5-80-110)

5. Emissions from the operation of the debarkers (EU ID# DB1 and DB2) shall not exceed the limits specified below:

Particulate Matter	66.9	lbs/hr
PM-10	66.9	lbs/hr

   (9 VAC 5-40-260 and 9 VAC 5-80-110)

6. Emissions from the operation of the chip screen (EU ID# CS) shall not exceed the limits specified below:

Particulate Matter	0.05	gr/dscf
PM-10	0.05	gr/dscf

   (9 VAC 5-40-2270 and 9 VAC 5-80-110)

7. Emissions from the operation of the Dry Waste Transfer System (EU ID #CTL) shall not exceed the limits specified below:

Particulate Matter	0.05	gr/dscf
PM-10	0.05	gr/dscf

(9 VAC 5-40-2270 and 9 VAC 5-80-110)

8. Emissions from the operation of the Sander (EU ID #SDR) shall not exceed the limits specified below:

Particulate Matter	0.05	gr/dscf
PM-10	0.05	gr/dscf

(9 VAC 5-40-2270 and 9 VAC 5-80-110)

9. Emissions from the operation of the Central Truck Loading Bin (EU ID #CTLB) shall not exceed the limits specified below (annual emissions are to be calculated monthly as the sum of the each consecutive 12-month period):

Particulate Matter	8.6	lbs/hr
PM-10	8.6	lbs/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110)

B. Monitoring

1. The debarkers and chip screen shall be observed visually at least once each calendar week to determine if the emissions of each unit, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A, Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-80-110 and 9 VAC 5-50-20)

2. The dry waste transfer system baghouse (PCD ID #BH2) shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A, Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A, Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-80-110 and 9 VAC 5-50-20)

3. The sander baghouse (PCD ID #BH1) shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A, Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A, Method 9, the

permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

(9 VAC 5-80-110 and 9 VAC 5-50-20)

4. The Central Truck Loading Bin shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-80-110, 9 VAC 5-40-20, and 9 VAC 5-50-20)

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual particulate emission calculations for the debarkers and chip screen.

   b. Results of visible emissions observations, any subsequent Method 9 visible emission evaluations, the cause of any abnormal and excess visible emissions, corrective measures taken to correct the excess visible emissions, and records of conditions which prevent Method 9 visible emission evaluations in the event of an apparently abnormal visible emission condition.

   c. Results of any emissions testing.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

   (9 VAC 5-80-110)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

   (9 VAC 5-40-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

   (9 VAC 5-80-110)

E. Reporting

1. The permittee shall report the results of any 40 CFR Part 60, Appendix A, Method 9 visible emissions evaluation performed in accordance with Conditions IV.B.1 through 4. If the test

indicates that any emissions unit is out of compliance with the opacity standard, the source shall also report the length of time associated with any exceedance of the standard and the corrective action taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-80-110 E)

V. Process Equipment Requirements – (Veneer Dryers EU ID# VD1-VD3; Veneer Conditioning Chamber EU ID# VCC; Presses EU ID# P1-P3; Moisture Sealant Surface Coating Line EU ID# SC-1)

A. Limitations

1. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions from the veneer dryers, heated zones (EU ID# VD1 - VD3) shall be controlled by a thermal catalytic oxidizer (RCO/RTO-1). The thermal catalytic oxidizer shall operate in one of two modes: thermal mode (high temperature) or catalytic mode (medium temperature). The thermal catalytic oxidizer shall achieve a destruction efficiency of at least 90 percent (for VOC and total HAP (measured as THC, as carbon)) on a mass basis in both control modes. The thermal catalytic oxidizer shall be provided with adequate access for inspection.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-95, 40 CFR 63.2240(b), and Condition 2 of 9/8/06 Permit)

2. Particulate emissions from the veneer dryers, heated zones (EU ID# VD1 - VD3) shall be controlled by a thermal catalytic oxidizer (RCO/RTO-1) with a control efficiency of at least 50 percent (for particulate matter) on a mass basis in both thermal and catalytic control modes. The thermal catalytic oxidizer shall be provided with adequate access for inspection.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 3 of 9/8/06 Permit)

3. The permittee shall minimize fugitive emissions from the veneer dryers by minimizing fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts). The permittee must develop and follow a plan for this minimization.

   (9 VAC 5-80-110, 40 CFR 63.2241(a), and 40 CFR 63.2265)

4. The thermal catalytic oxidizer firebox temperature when operating in thermal control mode shall be maintained above the minimum 3-hour block average firebox temperature determined in the thermal control mode performance test required by Condition V.D.3 and 40 CFR 63.2262 and which maintains the minimum control efficiencies in Conditions V.A.1 and 2.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-95, 40 CFR 63.2240(b), and Condition 4 of 9/8/06 Permit)

5. The thermal catalytic oxidizer firebox temperature when operating in catalytic mode shall be maintained above the minimum 3-hour block average firebox temperature determined in the most recent catalytic control mode performance test, which maintains the minimum control efficiencies in Conditions V.A.1 and 2.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-95, 40 CFR 63.2240(b), and Condition 5 of 9/8/06 Permit)

6. The routine control device maintenance exemption for the thermal catalytic oxidizer controlling veneer dryers emissions must not exceed 0.5 percent of annual operating uptime for each process unit controlled. The compliance options and operating requirements do not apply during times when control device maintenance covered under you approved routine control device maintenance exemption is performed. The permittee must minimize emissions to the greatest extent possible during these routine control device maintenance periods.

   (9 VAC 5-80-110 and 40 CFR 63.2251)

7. Volatile organic compound (VOC) emissions from the moisture sealant surface coating line (EU ID# SC-1) shall be controlled by the use of waterborne coatings. The VOC content of the waterborne coatings shall not exceed 0.03 lb/gal (as applied).

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 8 of 9/8/06 Permit)

8. Only non-HAP coatings shall be used in the moisture sealant surface coating line (EU ID# SC-1). Records shall be kept showing that only non-HAP coatings are being used.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-95, 40 CFR 63.2241(a), and Condition 9 of 9/8/06 Permit)

9. The approved fuels for the thermal catalytic oxidizer are natural gas and propane. A change in the fuel may require a permit to modify and operate.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-95, and Condition 15 of 9/8/06 Permit)

10. The veneer dryers (EU ID# VD1 - VD3) shall process no more than 375.0 million sq ft/yr (3/8" basis), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 12 of 9/8/06 Permit)

11. The veneer conditioning chamber (EU ID# VCC) shall process no more than 23.2 million sq ft/yr (3/8" basis), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 11 of 9/8/06 Permit)

12. The presses (EU ID# P1 - P3) shall process no more than 395.0 million sq ft/yr (3/8" basis), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 13 of 9/8/06 Permit)

13. The throughput of coatings to the moisture sealant surface coating line (EU ID# SC-1) shall not exceed 600,000 gallons per year, calculated monthly as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 14 of 9/8/06 Permit)

14. Visible emissions from the thermal catalytic oxidizer, excluding condensed water vapor or steam, shall not exceed 10 percent as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

    (9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 22 of 9/8/06 Permit)

15. Visible emissions from the veneer conditioning chamber (EU ID# VCC), cooling zone stacks (VDC-1 - VDC-3) and presses (EU ID# P1 - P3), excluding condensed water vapor or steam, shall not exceed 20 percent as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 21 of 9/8/06 Permit)

16. Emissions from the operation of the veneer dryers (exhausted through the thermal catalytic oxidizer stack) shall not exceed the limits specified below:

Particulate Matter	10.7	lbs/hr	38.5	tons/yr
PM-10	10.7	lbs/hr	38.5	tons/yr
Nitrogen Oxides (as NO_2)	2.5	lbs/hr	11.1	tons/yr
Carbon Monoxide	18.9	lbs/hr	80.9	tons/yr
Volatile Organic Compounds	4.5	lbs/hr	16.3	tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, and Condition 17 of 9/8/06 Permit)

17. Emissions from the operation of the veneer dryers cooling sections (EU ID# VDC-1 - VDC-3) shall not exceed the limits specified below:

Carbon Monoxide	2.2	lbs/hr	8.1	tons/yr
Volatile Organic Compounds	2.6	lbs/hr	9.4	tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, and Condition 18 of 9/8/06 Permit)

18. Emissions from the operation of the veneer conditions chamber (EU ID# VCC) shall not exceed the limits specified below:

Volatile Organic Compounds	0.6	lbs/hr	2.7	tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, and Condition 16 of 9/8/06 Permit)

19. Emissions from the operation of the presses (EU ID# P1 - P3) shall not exceed the limits specified below:

Particulate Matter	1.5	lbs/hr	4.8	tons/yr
PM-10	1.5	lbs/hr	4.8	tons/yr
Volatile Organic Compounds	9.3	lbs/hr	29.6	tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, and Condition 19 of 9/8/06 Permit)

20. Emissions from the operation of the moisture sealant surface coating line (EU ID# SC-1) shall not exceed the limits specified below:

Volatile Organic Compounds	5.4	lbs/hr	9.0	tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, and Condition 20 of 9/8/06 Permit)

21. The veneer dryers (EU ID# VD1 - VD3), presses (EU ID# P1 - P3), and moisture sealant surface coating line (EU ID# SC-1) shall be operated in accordance with 40 CFR 63 Subparts A and DDDD.

    (9 VAC 5-80-110, 40 CFR 63 Subparts A and DDDD, and Condition 23 of 9/8/06 Permit)

B. Monitoring

1. The thermal catalytic oxidizer shall be equipped with devices to continuously measure the firebox temperature. The devices shall be installed, calibrated, maintained and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The devices must meet the requirements in 40 CFR 63.2269(b)(1) through (6). Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the veneer dryers are operating.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-50-20 C, 9 VAC 5-50-260, 40 CFR 63.2269(b), and Condition 6 of 9/8/06 Permit)

2. The exhaust from the thermal catalytic oxidizer shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-40-20, 9 VAC 5-50-20)

3. The exhaust from the veneer conditioning chamber (EU ID# VCC) shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-40-20, 9 VAC 5-50-20)

4. The plywood presses (EU ID #P1-P3) shall be observed visually at least once each calendar week to determine if its emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.

   (9 VAC 5-40-20, 9 VAC 5-50-20)

5. **Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the thermal catalytic oxidizer controlling the veneer dryers according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
• Continuously monitor the firebox temperature when in each mode (catalytic and thermal) • Records shall be collected by a Data Acquisition System (DAS).	• Multiple temperature probes shall be utilized to ensure accurate readings. • Temperature probes shall be replaced as necessary.	• Thermal mode and catalytic mode: The minimum firebox temperature for each mode shall be based on the 3-hour block average combustion chamber temperature at which the unit was operating during the most recent compliance test. • Excursion: A 3-hour block average value below the minimum firebox temperature. • Data points shall be collected every 15 minutes, averaged over a 3-hour block period.

6. **Compliance Assurance Monitoring (CAM) -** The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

   (9 VAC 5-80-110 E and 40 CFR 64.6 (c))

7. **Compliance Assurance Monitoring (CAM) -** At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

   (9 VAC 5-80-110 E and 40 CFR 64.7 (b))

8. **Compliance Assurance Monitoring (CAM) -** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the veneer dryers are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

   (9 VAC 5-80-110 E and 40 CFR 64.7 (c))

9. **Compliance Assurance Monitoring (CAM) -** Upon detecting an excursion or exceedance, the permittee shall restore operation of the veneer dryers (including the control device and associated capture system) to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused

startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

(9 VAC 5-80-110 E and 40 CFR 64.7 (d)(1))

10. **Compliance Assurance Monitoring (CAM) -** Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

    (9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))

11. **Compliance Assurance Monitoring (CAM) -** If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

    (9 VAC 5-80-110 E and 40 CFR 64.7(e))

12. **Compliance Assurance Monitoring (CAM) -** If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the veneer dryers for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

    a. Improved preventative maintenance practices;

    b. Process operation changes;

    c. Appropriate improvements to control methods;

    d. Other steps appropriate to correct control performance; and

    e. More frequent or improved monitoring.

    (9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region Regional Office. These records shall include, but are not limited to:

a. Annual throughput of veneer (in square feet, 3/8" basis) to the veneer conditioning chamber (VCC), the dryers (VD1, VD2, and VD3) and presses (1, 2, & 3), calculated monthly as the sum of each consecutive 12-month period.

b. Records of thermal catalytic oxidizer firebox temperatures in both thermal and catalytic control modes to demonstrate compliance with the emission limits contained in Condition V.A.16.

c. Yearly catalyst activity tests and records if any necessary corrective action was taken to ensure that the catalyst is performing with in its design range.

d. Monthly and annual throughput of coatings through the moisture sealant surface coating line (EU ID# SC-1). Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.

e. Material Safety Data Sheets (MSDS) or other vendor information showing VOC and HAP content for each coating used on the moisture sealant surface coating line (EU ID# SC-1).

f. Copies of each notification and report that have been submitted to comply with MACT, Subpart DDDD.

g. Records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

h. Documentation that the facility is following their plan for minimizing fugitive emissions.

i. Records of current equipment throughput capacity and emission factors for the plywood presses, to demonstrate compliance with Condition V.A.15.

j. Results of visible emissions observations, any subsequent Method 9 visible emission evaluations, the cause of any abnormal and excess visible emissions, corrective measures taken to correct the excess visible emissions, and records of conditions which prevent Method 9 visible emission evaluations in the event of an apparently abnormal visible emission condition.

k. Scheduled and unscheduled maintenance and operator training.

l. Performance test records and results.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110, 40 CFR 63.2282, and Condition 28 of 9/8/06 Permit)

2. The permittee shall maintain a written startup, shutdown, and malfunction (SSM) plan as stated in §63.6(e) that describes, in detail, procedures for operating and maintaining the affected sources shown below during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the relevant standards limited by this permit:

Emission Unit ID	Equipment
VD1 - VD3	Veneer Dryers
P1 - P3	Presses
SC-1	Moisture sealant surface coating line

(9 VAC 5-80-110, 40 CFR 63.6(e), and 40 CFR 63.2250(c))

3. **Compliance Assurance Monitoring (CAM) Recordkeeping -** The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

   (9 VAC 5-80-110 E and 40 CFR 64.9(b))

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

   (9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 10 of 9/8/06 Permit)

2. Periodic activity tests shall be conducted on the thermal catalytic oxidizer catalyst to determine the ongoing activity level in terms of percent reduction of VOC. The periodic activity test requirement shall remain in effect so long as the oxidizer is operated as a catalytic unit. Unless otherwise approved in writing by the DEQ, the interval for these periodic activity tests shall not exceed 12 months of thermal catalytic oxidizer operation, calculated from the month following the most recent valid periodic activity test.

   (9 VAC 5-80-110, 9 VAC 5-80-1180, 40 CFR 63.2240(b), and Condition 7 of 9/8/06 Permit)

3. Initial performance tests shall be conducted on the thermal catalytic oxidizer stack while operating in thermal mode for VOC, HAPs, particulate matter, CO, and NO_X to determine compliance with Conditions V.A.1, 2, and 16. Concurrently, initial performance tests shall be conducted for VOC and particulate matter at the inlet to the thermal catalytic oxidizer to determine compliance with Conditions V.A.1 and 2. The initial performance tests shall be performed and demonstrate compliance within 90 days of beginning thermal mode operation of the thermal catalytic oxidizer. Stack tests for new or modified sources shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30 of State Regulations and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. Compliance tests shall be reported to the Director, Piedmont Regional Office in writing within 45 days of test completion and shall conform to the test report format enclosed with this permit.

   (9 VAC 5-80-110, 9 VAC 5-50-30 and 9 VAC 5-60-30, and Condition 25 of 9/8/06 Permit)

4. During initial performance testing for thermal catalytic oxidizer as required by Condition V.D.3, a baseline temperature shall be established and recorded to ensure destruction efficiency listed in Conditions V.A.1 and 2. Baseline temperatures shall be established for the thermal catalytic oxidizer when operating both in catalytic mode and thermal mode. Records shall be kept on file for the life of the thermal catalytic oxidizer.

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 26 of 9/8/06 Permit)

5. Concurrent with the Performance Test required by Condition V.D.3, Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted on the thermal catalytic oxidizer stack. The test shall consist of 30 sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the test are to be arranged with the Piedmont Regional Office and shall be capable of demonstrating compliance. The permittee shall submit a test protocol at least 30 days prior

to testing. The evaluation shall be performed within 60 days after achieving the maximum production rate at which the facility will be operated. Should conditions prevent concurrent opacity observations, the Piedmont Regional Office shall be notified in writing, within seven days, and visible emissions testing shall be rescheduled within 30 days. Rescheduled testing shall be conducted under the same conditions (as possible) as the initial performance tests. Two copies of the test result shall be submitted to the Piedmont Regional Office within 60 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-80-110, 9 VAC 5-50-30 and 9 VAC 5-80-1200, and Condition 27 of 9/8/06 Permit)

6. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

   (9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit semi-annual compliance reports to the Piedmont Regional Office within 30 days after the end of each calendar 6 month period as specified in 40 CFR 63.2281.

   (9 VAC 5-80-110 F and 40 CFR 63.2281)

2. The permittee shall report the results of any 40 CFR Part 60, Appendix A Method 9 visible emissions evaluation performed in accordance with Conditions V.B.2, 3, and 4. If the test indicates that any emissions unit is out of compliance with the opacity standard, the source shall also report the length of time associated with any exceedance of the standard and the corrective action taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

   (9 VAC 5-80-110 E)

3. **Compliance Assurance Monitoring (CAM) Reporting** - The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by General Condition C.3 of this permit to the Director, Piedmont Regional Office. Such reports shall include at a minimum:

   a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

   b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

   c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

   (9 VAC 5-80-110 F and 40 CFR 64.9(a))

VI. Facility Wide Conditions

A. Limitations

1. In order to minimize the duration and frequency of excess emissions, including visible emissions, due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to the DEQ upon request.

   b. Maintain an inventory of spare parts that are needed to minimize duration of air pollution control equipment breakdowns.

   (9 VAC 5-50-20 and 9 VAC 5-80-110)

2. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided, including names of trainees, date of training, and nature of training.

   (9 VAC 5-50-20 and 9 VAC 5-80-110)

3. Existing Source Standard for Visible Emissions – Except where otherwise specified in this permit, the permittee shall not cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 60% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section.

   (9 VAC 5-50-80 and 9 VAC 5-80-110)

4. Start-up, Shutdown, and Malfunction – At all times, including periods of startup, shutdown and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

   (9 VAC 5-50-20 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrated compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

   a. Maintenance and operator training records for air pollution control equipment.

   b. Opacity records.

   c. Emissions data, including emission factors and throughput data.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years

(9 VAC 5-50-50 and 9 VAC 5-80-110)

C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

   (9 VAC 5-40-30, 9 VAC 5-50-30, and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

   (9 VAC 5-80-110)

VII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
FCS	First-Cut Saw	9 VAC 5-80-720 B	PM/PM-10	--
CUS	Cut-Up Saws	9 VAC 5-80-720 B	PM/PM-10	--
CS-C1, CS-C2	Chip Screen Relay Cyclones	9 VAC 5-80-720 B	PM/PM-10	--
CV-1 through CV-10	Conveyors	9 VAC 5-80-720 B	PM/PM-10	--
VD2, VD3 (C4)	Vacuum Exhaust Cyclone	9 VAC 5-80-720 B	PM/PM-10	--
GL1, GL2	Glue Lines No. 1 & 2	9 VAC 5-80-720 B	VOC	--
T #'s	Tanks	9 VAC 5-80-720	VOC	varies
FH	Fuel House Bark Unloading	9 VAC 5-80-720 B	PM/PM-10	--
CTB	Chip Truck Bin	9 VAC 5-80-720 B	PM/PM-10	--
UPRD	Unpaved Roads	9 VAC 5-80-720 B	PM/PM-10	--
PM	Plywood Mill Fugitive Emissions	9 VAC 5-80-720 B	PM/PM-10 VOC	--

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

VIII. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	This Subpart does not apply to the wood-fired boiler (EU ID# WWB) since the construction of this unit commenced before June 19, 1984, and has not been "modified" according to the NSPS definition.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

IX. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

      (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

   c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

7. One copy of the annual compliance certification shall be sent to EPA at the following address:

   Clean Air Act Title V Compliance Certification (3AP00)
   U.S. Environmental Protection Agency, Region III
   1650 Arch Street
   Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC

5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

   (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

   (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

   (9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the

change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

   (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

   d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)